

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

REALTRUST IRA ALTERNATIVES,)
LLC, f/k/a ENTRUST NORTHWEST, LLC,))

Plaintiff,)

v.)

THE ENTRUST GROUP,)
INTERNATIONAL BANK &)
TRUST, and MECHANICS BANK,)

Defendants.)

Civil Action No.
1:10-cv-00382-LM

PLAINTIFF’S NOTICE OF INTENT TO FILE SUR-REPLY

Plaintiff, RealTrust IRA Alternatives, LLC f/k/a Entrust Northwest, LLC, (“ENW”), by its attorneys, Donovan Hatem LLP, hereby submits this Notice of Intent to file a surreply memorandum to rebut the arguments raised in defendant, Mechanics Bank’s (“Mechanics”) Reply to Plaintiff’s Objection to Mechanic’s Motion to Dismiss. A sur-reply would greatly assist the Court in ruling on the Motion(s) to Dismiss as the Reply Memoranda have raised issues to which ENW can respond with well-supported case law. Given the issues explored in this matter and the impact upon the general public, a sur-reply will help put the applicable case law into perspective.

Respectfully submitted,

RealTrust IRA Alternatives,
LLC f/k/a Entrust Northwest,
LLC
By its attorneys,

/s/ John W. Dennehy
John W. Dennehy
DONOVAN HATEM LLP
Two Seaport Lane
Boston, MA 02210
(617) 406-4500

Dated: January 7, 2011

CERTIFICATE OF SERVICE

I certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), this 7th day of January, 2011.

/s/ John W. Dennehy
John W. Dennehy